

1 E. MARTIN ESTRADA  
United States Attorney  
2 DAVID M. HARRIS  
Assistant United States Attorney  
3 Chief, Civil Division  
JOANNE S. OSINOFF  
4 Assistant United States Attorney  
Chief, Complex and Defensive Litigation Section  
5 JASMIN YANG (Cal. Bar No. 255254)  
YUJIN CHUN (Cal. Bar No. 306298)  
6 Assistant United States Attorney  
Federal Building, Suite 7516  
7 300 North Los Angeles Street  
Los Angeles, California 90012  
8 Telephone: (213) 894-8827 (Yang) -0929 (Chun)  
Facsimile: (213) 894-7819  
9 E-mail: jasmin.yang@usdoj.gov  
yujin.chun@usdoj.gov

10 Attorneys for the United States of America

11  
12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 JENI PEARSONS, et al.,

16 Plaintiffs,

17 v.

18 UNITED STATES OF AMERICA, et  
19 al.,

20 Defendants.

No. 2:23-cv-07952-RGK-MAR

**STIPULATION TO SET BRIEFING  
SCHEDULE ON MOTIONS TO  
DISMISS**

Honorable R. Gary Klausner  
United States District Judge

21  
22 Counsel for plaintiffs Jeni Pearsons and Michael Storc (“Plaintiffs”) and  
23 defendants United States of America (“United States”) and Lynne Zellhart (the  
24 United States and Lynne Zellhart are hereinafter collectively referred to as  
25 “Defendants”) hereby enter into the following stipulation to set the briefing schedule on  
26 Defendants’ anticipated motions to dismiss. The stipulation is based on the following:  
27  
28

1           1.     Plaintiffs served their Complaint on defendant United States on October 16,  
2 2023 and on defendant Lynne Zellhart on November 7, 2023.

3           2.     The parties previously stipulated that Defendants shall have an additional  
4 thirty (30) days to respond to the Complaint such that the United States' deadline to  
5 respond to the Complaint shall be January 16, 2024 and Lynne Zellhart's deadline to  
6 respond to the Complaint is February 7, 2024.

7           3.     The parties hereby stipulate to a consolidated briefing schedule to enable  
8 Defendants' anticipated motions to dismiss to be heard on the same schedule.

9           ACCORDINGLY, Plaintiffs and Defendants HEREBY STIPULATE THAT

10          (1) The United States and Zellhart's anticipated motions to dismiss shall be briefed  
11 and heard on the following schedule, subject to Court approval:

12               a. Motion Filing Deadline: January 16, 2024

13               b. Plaintiffs' Opposition Deadline: February 6, 2024

14               c. Reply Deadline: February 16, 2024

15               d. Hearing: March 4, 2024 at 9:00 a.m.

16          Dated: December 13, 2023     Respectfully submitted,

17                               INSTITUTE FOR JUSTICE  
18                               Joseph Gay\*  
19                               Robert Frommer\*  
20                               Robert E. Johnson\*

21                               THE VORA LAW FIRM, P.C.  
22                               Lou Egerton-Wiley  
23                               Nilay U. Vora  
24                               Jeffrey Atteberry

25                               /s/ Joseph Gay

26                               JOSEPH GAY

27                               Counsel for Plaintiffs

28                               \* Admitted *pro hac vice*

1 Dated: December 13, 2023

E. MARTIN ESTRADA  
United States Attorney  
DAVID M. HARRIS  
Assistant United States Attorney  
Chief, Civil Division  
JOANNE S. OSINOFF  
Assistant United States Attorney  
Chief, Complex and Defensive Litigation Section

6 /s/ Jasmin Yang

JASMIN YANG

7 Assistant United States Attorney

8 Attorneys for the United States of America and  
9 Lynne Zellhart

10 ATTESTATION UNDER LOCAL RULE 5-4.3.4

11 I, Jasmin Yang, am the ECF User whose ID and password are being used to file  
12 this **STIPULATION TO SET BRIEFING SCHEDULE ON MOTIONS TO**  
13 **DISMISS**. In compliance with Local Rule 5-4.3.4(a)(2), I hereby certify and attest that  
Plaintiffs' counsel, Joseph Gay, has concurred in this filing.

14 DATED: December 13, 2023

/s/ Jasmin Yang

15 JASMIN YANG

16 Assistant United States Attorney